

BEFORE THE  
STATE OF WISCONSIN  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
DIVISION OF SECURITIES

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In the Matter of,

ORIONCAPITAL.LIVE,  
AIPCAPITALMARKETS.COM,  
PAUL THOMAS,  
JEREMIAH MIRACLE OGBO,  
MITCHELL MADDISON, and  
TENER GENEK

SUMMARY ORDER TO CEASE AND  
DESIST AND REVOKING EXEMPTIONS  
AND NOTICE OF PROPOSED ORDER  
FOR RESTITUTION AND PENALTIES

Respondents.

DFI Case No. S-251344 (EX)

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**I.**

The Administrator of the State of Wisconsin Department of Financial Institutions, Division of Securities (“Division”), having legal authority and jurisdiction to administer and enforce the Wisconsin Uniform Securities Law, Wis. Stat. Ch. 551 (“Ch. 551”) and rules and orders promulgated thereunder, and having determined that this action is necessary and appropriate in the public interest and for the protection of investors, hereby enters this order as follows:

**II.**

Division staff have presented evidence sufficient for the Administrator to make the following findings of fact and conclusions of law:

**A. Findings of Fact**

**Respondents**

1. Prior to March 2025, OrionCapital.live purported to operate an online digital copy trading investment platform. In March 2025, OrionCapital.live was shut down and all activity was moved to AIPCapitalMarkets.com.
2. Since March 2025, AIPCapitalMarkets.com, the successor to OrionCapital.live, has purported to operate an online digital copy trading investment platform.
3. At all relevant times, Paul Thomas (“Thomas”) was the domain owner of AIPCapitalMarkets.com, with an email address of [finsecure0@gmail.com](mailto:finsecure0@gmail.com), and a purported physical address of 2 Kwara Street, Illorin, Kwara, Nigeria 500067.

4. At all relevant times, Jeremiah Miracle Ogbo (“Ogbo”), located in Nigeria, controlled at least 1 wallet on the Binance exchange that received funds attributed to Wisconsin investor [REDACTED] (“Investor CG”). Upon information and belief, Ogbo commingled Investor CG’s funds with the funds of other investors in the wallet. KYC information registered with Binance identifies Ogbo’s address as 93, Evive Road, Oleh, Isoko South, Delta State in Nigeria. Ogbo’s email address is [ogbojerry2000@yahoo.com](mailto:ogbojerry2000@yahoo.com).
5. Tener Genek (“Genek”), using the websites OrionCapital.live and AIPCapitalMarkets.com, offered investment advice and made misrepresentations about those websites to Investor CG. Genek is likely a fictitious identity intended to spoof the online presence of a legitimate copy trader named Taner Genek, who is located in Greece. Tener Genek’s WhatsApp number is 802-772-0258.
6. Mitchell Maddison (“Maddison”) is likely an alias for one or more control persons of AIPCapitalMarkets.com and/or OrionCapital.live with no known address. Maddison’s WhatsApp number is 513-582-1635.

## **Conduct**

7. The website AIPCapitalMarkets.com promoted itself as a “cutting-edge trading platform that allows users to invest in both stocks and cryptocurrencies by copying the strategies of expert traders... By following top tier traders in real time, users can mirror their trades and grow their wealth without needing to actively manage their portfolios.”
8. According to AIPCapitalMarkets.com, one of its key features was the ability to connect investors directly with top-tier traders. “You browse through a list of expert traders, each with a detailed profile showing their trade history, risk level and performance. You can then choose which traders to follow, based on their track record and trading style. Once you’ve selected a trader, you can copy their trades in real time—mirroring their buy and sell decisions with your own portfolio.”
9. The website AIPCapitalMarkets.com purported to have over 480,000 users and a monthly trade volume of \$8 million, with connections to “globally renowned banking partners.”
10. Investor CG belonged to a Facebook group for couples who have Dual-Income, No Kids (“DINKS”). One participant who identified herself as Maddison said she did digital investments. Investor CG messaged Maddison through Facebook Messenger, and they started having a conversation about investments. Maddison identified Genek as a successful trader she followed online. Maddison introduced Investor CG to Genek on Facebook Messenger.
11. In or around January of 2025, based on Maddison’s recommendation, Investor CG opened an account on OrionCapital.live and began copy trading based on Genek’s trades. This entailed Investor CG depositing funds into his account and selecting Genek as the trader he wanted to follow. The platform then conducted the trades on CG’s behalf.

12. In March of 2025, Genek notified Investor CG there would be a new website to improve security and that all accounts would be transferred over. Investor CG received emails from the new site, [www.AIPCapitalMarkets.com](http://www.AIPCapitalMarkets.com), and all of CG's account and trading information appeared to have transferred over to the new website.
13. Maddison said her experience trading with Genek was 5-10 times returns on the investment. Based on Maddison's representations, Investor CG deposited small amounts into his AIPCapitalMarkets account and selected Genek as the trader to follow. Genek showed Investor CG his purported profits live on the AIPCapitalMarkets.com website at the end of each trading session.
14. Investor CG purportedly experienced a profitable trading session in May of 2025. To withdraw his profits, Investor CG was told he would need to pay 10% of his profits as a trading fee, which had been disclosed up front. He paid the initial trading fee of \$47 and received \$477 in "profits" in June of 2025. This experience gave Investor CG confidence to make additional investments.
15. From February to June of 2025, Investor CG invested \$24,961.39 with AIPCapitalMarkets.com. At one point, Investor CG was told the cryptocurrency prices had exploded and his account balance had grown to over \$767,000. On July 10, 2025, to withdraw his purported profits, Investor CG paid \$48,484.54 in trading fees as instructed by the platform. However, no funds were returned to CG.
16. In all, between February 8, 2025 and July 10, 2025, Investor CG conducted 16 cryptocurrency transactions in the aggregate amount of \$73,445.93 comprised of investment funds and trading fees.
17. Contrary to the representations of the Respondents, Investor CG's funds were never invested in a digital copying cryptocurrency trading platform. Instead, all of CG's funds were siphoned into numerous unhosted wallets and trading platforms, including but not limited to Binance, ByBit, Bitget, Crypto.com, Triple A, and BingX.
18. Division staff traced Investor CG's funds to an unhosted cryptocurrency wallet, identified as TERD4WMUxRoZK5Kf1mEbh2fhcE9dZbXZYj. This wallet holds some of Investor CG's funds which, upon information and belief, is commingled with other victim funds from other scams or schemes perpetrated by the same group. Wallet TERD4WMUxRoZK5Kf1mEbh2fhcE9dZbXZYj holds approximately \$35,000 of United States Dollar Tether (USDT) cryptocurrency, including approximately \$18,529.75 of USDT attributed to Investor CG's funds. As of the date of this Order, all assets in wallet TERD4WMUxRoZK5Kf1mEbh2fhcE9dZbXZYj, are frozen.
19. Division staff identified 31 domains affiliated with AIPCapitalMarkets.com that registered with the same domain registrar from the same IP address. Division staff succeeded in taking down 16 active domains affiliated with AIPCapitalMarkets.com.

20. The digital copy trading investment programs promoted by Respondents required the investment of money into the investment programs managed by Respondents from which the investor expected profits to be derived from the efforts of Respondents.
21. Respondents, for compensation, engaged in the business of advising Investor CG as to the value of securities and the advisability of investing in and purchasing securities in this state.
22. Investor CG was a passive investor, providing investment funds to Respondents but having no control or access to the account held by Respondents. The investment was entirely managed by Respondents.
23. Respondents designed the securities investment programs to accept offers to purchase from investors in Wisconsin and allow Wisconsin investors to enroll in its passive income investment program.
24. In connection with the offers of securities, Respondents failed to disclose: the identity of any of the firm's principals and management; the firm's location or the location of any of its principals and management; the firm's financial statements, including its assets, liabilities and profitability; the risks of investing in cryptocurrency transactions on the digital copy trading platform; and additional fees charged for withdrawal of funds from the platform. Further, Respondents failed to disclose any applicable licensing, such as money transmitter licensing or securities registrations.
25. At no time were Respondents registered with the Division in any capacity.

## **B. Conclusions of Law**

### **Legal Authority and Jurisdiction**

26. The Administrator has legal authority and jurisdiction over the conduct described above, pursuant to Wis. Stat. Ch. 551 and the rules and orders promulgated thereunder.
27. Pursuant to Wis. Stat. § 551.102(28)(d)(1), the digital copy trading investment programs offered and sold by Respondents are investment contract securities under Wisconsin law. Specifically, Investor CG deposited funds onto the AIPCapitalMarkets.com investment platform for the purpose of generating passive income and invested his assets with Respondents with the expectation of profits through the essential managerial efforts of someone other than Investor CG.
28. In addition, pursuant to Wis. Stat. § 551.102(28)(d)(2), the digital copy trading investment programs offered and sold by Respondents are investment contract securities under Wisconsin law. Specifically, Investor CG deposited funds into the AIPCapitalMarkets.com investment platform for the purpose of generating a passive income and furnished initial value to Respondents based on representations from Respondents by which the Wisconsin investors like Investor CG reasonably understood that a valuable benefit of some kind over and above the initial funds would accrue to them as a result of the operation of the

enterprise, and with the Wisconsin investors not having the right to exercise practical and actual control over the managerial decisions of the enterprise.

29. The investment contracts sold by Respondents to Investor CG were required to be, but were not, registered with the Division.
30. Pursuant to Wis. Stat. § 551.301(1), it is unlawful to offer or sell securities in Wisconsin unless the securities are registered under Ch. 551, federally covered securities, or exempted from registration under Ch. 551.
31. Pursuant to Wis. Stat. § 551.501(1), it is unlawful for a person, in connection with the offer, sale, or purchase of a security, directly or indirectly, to employ a device, scheme, or artifice to defraud.
32. Pursuant to Wis. Stat. § 551.501(2), it is unlawful for a person, in connection with the offer, sale or purchase of a security, directly or indirectly, to make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.
33. Pursuant to Wis. Stat. § 551.501(3), it is unlawful for a person, in connection with the offer, sale or purchase of a security, directly or indirectly, to engage in an act, practice or course of business that operates or would operate as a fraud or deceit upon another person.
34. The Respondents were further transacting business in this state as an investment adviser as defined under Wis. Stat. § 551.102(15) because the digital copying investment program included making recommendations about the advisability of investing in securities and making recommendations to purchase specific securities for compensation.
35. Pursuant to Wis. Stat. § 551.403(1), it is unlawful for a person to transact business in this state as an investment adviser unless the person is registered under Ch. 551 as an investment adviser or is exempt from registration under Wis. Stat. § 551.403(2).

### **Violations**

36. As described above, Respondents violated Wis. Stat. § 551.301 by selling, offering to sell, and accepting offers to purchase securities in this state that were not registered and were not exempt from registration.
37. As described above, Respondents violated Wis. Stat. § 551.501(1-3) when, in connection with the offer and sale of the digital copy trading investment programs, Respondents directly or indirectly employed a device, scheme, or artifice to defraud, engaged in acts, practices, or a course of business that operated as a fraud or deceit, and made untrue statements of material fact and omitted to state material facts necessary in order to make the statements made, under the circumstances under which they were made, not misleading.

38. As described above, Respondents violated Wis. Stat. § 551.403(1) by transacting business as an investment adviser in Wisconsin without being registered under Ch. 551 or exempted from registration under Wis. Stat. § 551.403(2).

### III.

In view of the above findings of fact and conclusions of law, the Administrator deems it necessary and appropriate in the public interest and for the protection of investors, and pursuant to its legal authority and jurisdiction under Ch. 551, to wit Wis. Stat. § 551.604, to issue the following orders and notices:

#### A. Summary Orders issued pursuant to Wis. Stat. § 551.604(2)

- (a) IT IS ORDERED summarily that RESPONDENTS, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of any RESPONDENT, shall cease and desist from making or causing to be made in or from Wisconsin to any person or entity any further offers or sales of securities unless and until such securities qualify as covered securities or are registered under Ch. 551 or successor statute, pursuant to Wis. Stat. §§ 551.604(1)(a) and (2).
- (b) IT IS FURTHER ORDERED summarily that all exemptions from registration set forth at Ch. 551 or successor statute that might otherwise apply to any offer or sale of any security of or by the RESPONDENTS, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of any RESPONDENT, are hereby revoked, pursuant to Wis. Stat. §§ 551.604(1)(b) and (2).
- (c) IT IS FURTHER ORDERED summarily that all exemptions from registration set forth in Wis. Stat. §§ 551.201 and 551.202 that may otherwise apply to a specific security, transaction or offer of or by the RESPONDENTS, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of any RESPONDENT, are hereby revoked, pursuant to Wis. Stat. §§ 551.604(1)(c) and (2).
- (d) IT IS FURTHER ORDERED summarily that RESPONDENTS, their successors, affiliates, controlling persons, officers, agents, servants, employees and every entity and person directly or indirectly controlled or hereafter organized by or on behalf of any RESPONDENT, are prohibited from violating Wis. Stat. § 551.501 and Wis. Stat. § 551.502 or successor statutes.
- (e) IT IS FURTHER ORDERED summarily that RESPONDENTS, their successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or hereafter organized by or on behalf of any RESPONDENT, are prohibited from violating Ch. 551 or successor statute that might otherwise apply to any offer or sale of a security of or by RESPONDENTS.

- (f) PLEASE TAKE NOTICE that the summary orders of the Administrator are effective as of the issuance of this order, pursuant to Wis. Stat. § 551.604(2). You are advised that any willful violation of an order issued by the Division under Ch. 551 is a criminal offense punishable under the provisions of Wis. Stat. § 551.508.

## **B. Proposed Orders**

- (g) IT IS PROPOSED that an order be issued against Respondents, jointly and severally, to pay restitution in the amount of **\$73,445.93** with interest on such amount at the legal rate under Wis. Stat. § 138.04, starting from the date of the transaction through the date of satisfaction, pursuant to Wis. Stat. § 551.604(4m). Such payment shall be made payable to the Wisconsin Department of Financial Institutions and shall be remitted to the Division no later than 30 calendar days from the date of issuance of this order, or if a petition for a hearing is filed as provided under Wis. Stat. § 551.604(2), by a date to be fixed by a final order. Respondents shall reach out to the Division for written instructions to make the payments before the due date.
- (h) IT IS FURTHER PROPOSED that an order be issued imposing a civil penalty against Respondents, jointly and severally, in the form of an administrative assessment totaling **\$73,445.93** for the violations committed against Investor CG pursuant to Wis. Stat. § 551.604(4). Such payment shall be made payable to the Wisconsin Department of Financial Institutions and shall be remitted to the Division no later than 30 calendar days from the date of issuance of this order, or if a petition for a hearing is filed as provided under Wis. Stat. § 551.604(2), by a date to be fixed by a final order. Respondents shall reach out to the Division for written instructions to make the payments before the due date.
- (i) IT IS FURTHER PROPOSED that an order be issued imposing the actual costs of the investigation or proceeding pursuant to Wis. Stat. § 551.604(5) against Respondents.
- (j) IT IS FURTHER PROPOSED that an order be issued prohibiting Respondents, their successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or hereafter organized by or on behalf of any Respondent, from becoming registered in any capacity under Ch. 551 or successor statute that might otherwise apply, prior to satisfying their civil liabilities under Wis. Stat. §§ 551.604(4), (5) and (4m) as ordered in the above paragraphs.

## **C. Service of Order**

- (k) IT IS FURTHER ORDERED that this order shall be sent promptly by certified mail to each party named in the order at his or her last known address or to the party's attorney of record, or shall be personally served upon the party or the party's attorney of record, pursuant to Wis. Admin. Code § DFI-Sec. 8.06. This order shall also be served upon the office of the administrator pursuant to Wis. Stat. § 551.611.
- (l) PLEASE TAKE NOTICE that the date of the service of this order is the date it is placed in the mail if service is by certified mail. If a party or the party's attorney is personally served,

the date of service is the date service is completed. You are advised that any willful violation of an Order issued by the Division under Ch. 551 is a criminal offense punishable under the provisions of Wis. Stat. § 551.508.

#### **D. Notice of Hearing Rights**

- (m) PLEASE TAKE NOTICE that you have the right to request a hearing pursuant to Wis. Stat. § 551.604(2). Every request for a hearing shall be in the form of a written petition filed with the Division, pursuant to Wis. Admin. Code § DFI-Sec. 8.01 and Wis. Stat. § 227.42. A petition for a hearing to review the order shall:
- (1) Plainly admit or deny each specific allegation, finding or conclusion in the order and incorporated papers. However, if the petitioner lacks sufficient knowledge or information to permit an admission or denial, the petition shall so state, and that statement shall have the effect of a denial; and
  - (2) State all affirmative defenses. Affirmative defenses not raised in the request for hearing may be deemed waived.
- (n) PLEASE TAKE FURTHER NOTICE that you may file your written petition:
- (1) By mailing the written petition to:  
Division of Securities  
Wisconsin Department of Financial Institutions  
P.O. Box 1768  
Madison, Wisconsin 53701;
  - (2) By delivering the written petition in person to:  
Division of Securities  
Wisconsin Department of Financial Institutions  
4822 Madison Yards Way, North Tower, 4<sup>th</sup> Floor  
Madison, Wisconsin 53705; or
  - (3) By faxing the written petition to 608-264-7979.
- (o) PLEASE TAKE FURTHER NOTICE that the petition for hearing must be filed with the Division. Pursuant to Wis. Stat. § 551.102(8), “filing” means “receipt.” Therefore, a petition is not “filed” with the Division until it is actually “received” by the Division. If the Division does not receive your written petition before midnight on the 30<sup>th</sup> day after the date of service of this order, your right to a hearing will be waived and the Summary Order shall become final by operation of law.
- (p) PLEASE TAKE FURTHER NOTICE that within 15 days after receipt of a request in a record from you, the matter will be scheduled for a hearing or other public administrative proceedings, pursuant to Wis. Stat. §§ 551.604(2) and (3).
- (q) PLEASE TAKE FURTHER NOTICE that if you do not request a hearing and none is ordered by the Administrator within 30 days after the date of service of this order, the findings of fact, conclusions of law, and summary and proposed orders, including any imposition of civil penalties, disgorgement, restitution, costs, and all applicable interest, become final as by operation of law, pursuant to Wis. Stat. § 551.604(2).

- (r) PLEASE TAKE FURTHER NOTICE violations of this order may be enforced by any investor, or by the Division whether acting in its own right or on behalf of the investor, by petitioning any court of competent jurisdiction to enforce the terms of the order.
- (s) PLEASE TAKE FURTHER NOTICE failure to provide a copy of this order to prospective investors may be a material misrepresentation in violation of Ch. 551 and this order.
- (t) PLEASE TAKE FURTHER NOTICE that any willful violation of an order by the Division under Ch. 551 is a criminal offense punishable under the provisions of Wis. Stat. § 551.508.

EXECUTED at Madison, Wisconsin, this 18th day of December, 2025.



A handwritten signature in blue ink, appearing to read "Matthew Lynch", written over a horizontal line.

Matthew Lynch  
Chief Legal Counsel  
Department of Financial Institutions

*On behalf of the Administrator of the Division of Securities*

Division of Securities  
State of Wisconsin  
Department of Financial Institutions  
4822 Madison Yards Way, 4<sup>th</sup> Floor  
Madison, Wisconsin 53705



State of Wisconsin
Department of Financial Institutions

Tony Evers, Governor

Wendy K. Baumann, Secretary-designee

AFFIDAVIT OF SERVICE
AND COMPLIANCE WITH WIS. STAT. § 551.611

STATE OF WISCONSIN )
) ss.
COUNTY OF DANE )

I, KATHERINE CLEMENTI, first being duly sworn, depose and state:

- 1. I am employed with the State of Wisconsin, Department of Financial Institutions, Division of Securities.
2. On the date of this Affidavit and in the course of regularly conducted activity, I have caused to be served by email upon Paul Thomas at finsecure0@gmail.com:
i. A copy of the Summary Order to Cease and Desist and Revoking Exemptions and Notice of Proposed Order for Restitution and Penalties; DFI Case No. S-251344 (EX); and
ii. A copy of this Affidavit of Service.
3. In compliance with Wis. Stat. §§ 227.48, 551.611, and 891.46; and Wis. Admin. Code. §§ DFI-Sec 8.06 and 8.07, I have also caused to be served copies of those same documents upon the Administrator for the Division of Securities.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Katherine Clementi
KATHERINE CLEMENTI

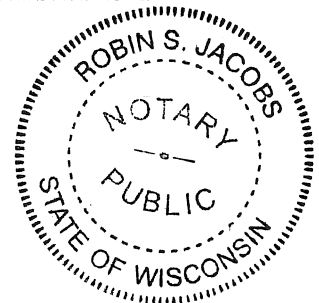
State of Wisconsin
Department of Financial Institutions
Division of Securities

Subscribed and sworn to before me
This 23rd day of December, 2025.

[Signature]

(Notary Seal)

Notary Public, State of Wisconsin
My commission is permanent.





State of Wisconsin
Department of Financial Institutions

Tony Evers, Governor

Wendy K. Baumann, Secretary-designee

AFFIDAVIT OF SERVICE
AND COMPLIANCE WITH WIS. STAT. § 551.611

STATE OF WISCONSIN )
) ss.
COUNTY OF DANE )

I, KATHERINE CLEMENTI, first being duly sworn, depose and state:

- 1. I am employed with the State of Wisconsin, Department of Financial Institutions, Division of Securities.
2. On the date of this Affidavit and in the course of regularly conducted activity, I have caused to be served by certified mail upon Paul Thomas at his last known business address 2 Kwara Street, Illorin, Kwara, Nigeria 500067:
i. A copy of the Summary Order to Cease and Desist and Revoking Exemptions and Notice of Proposed Order for Restitution and Penalties; DFI Case No. S-251344 (EX); and
ii. A copy of this Affidavit of Service.
3. In compliance with Wis. Stat. §§ 227.48, 551.611, and 891.46; and Wis. Admin. Code. §§ DFI-Sec 8.06 and 8.07, I have also caused to be served copies of those same documents upon the Administrator for the Division of Securities.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

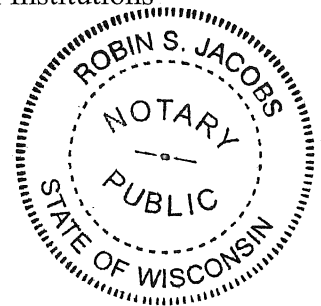
Katherine Clementi
KATHERINE CLEMENTI

State of Wisconsin
Department of Financial Institutions
Division of Securities

Subscribed and sworn to before me
This 23rd day of December 2025.

[Signature]
Notary Public, State of Wisconsin
My commission is permanent.

(Notary Seal)





State of Wisconsin
Department of Financial Institutions

Tony Evers, Governor

Wendy K. Baumann, Secretary-designee

AFFIDAVIT OF SERVICE
AND COMPLIANCE WITH WIS. STAT. § 551.611

STATE OF WISCONSIN )
) ss.
COUNTY OF DANE )

I, KATHERINE CLEMENTI, first being duly sworn, depose and state:

- 1. I am employed with the State of Wisconsin, Department of Financial Institutions, Division of Securities.
2. On the date of this Affidavit and in the course of regularly conducted activity, I have caused to be served by email upon Jeremiah Miracle Ogbo at ogbojerry2000@yahoo.com:
i. A copy of the Summary Order to Cease and Desist and Revoking Exemptions and Notice of Proposed Order for Restitution and Penalties; DFI Case No. S-251344 (EX); and
ii. A copy of this Affidavit of Service.
3. In compliance with Wis. Stat. §§ 227.48, 551.611, and 891.46; and Wis. Admin. Code. §§ DFI-Sec 8.06 and 8.07, I have also caused to be served copies of those same documents upon the Administrator for the Division of Securities.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Katherine Clementi
KATHERINE CLEMENTI

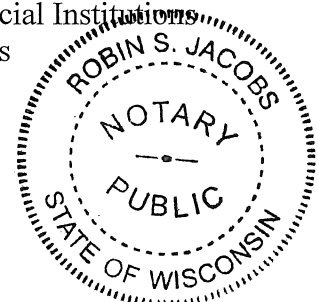
State of Wisconsin
Department of Financial Institutions
Division of Securities

Subscribed and sworn to before me
This 23rd day of December 2025.

Peri Jan

Notary Public, State of Wisconsin
My commission is permanent.

(Notary Seal)





State of Wisconsin
Department of Financial Institutions

Tony Evers, Governor

Wendy K. Baumann, Secretary-designee

AFFIDAVIT OF SERVICE
AND COMPLIANCE WITH WIS. STAT. § 551.611

STATE OF WISCONSIN )
) ss.
COUNTY OF DANE )

I, VALERIE SCHMIDT, first being duly sworn, depose and state:

- 1. I am employed with the State of Wisconsin, Department of Financial Institutions, Division of Securities.
2. On the date of this Affidavit and in the course of regularly conducted activity, I have caused to be served via WhatsApp upon Tener Genek at (802) 772-0258:
i. A copy of the Summary Order to Cease and Desist and Revoking Exemptions and Notice of Proposed Order for Restitution and Penalties; DFI Case No. S-251344 (EX); and
ii. A copy of this Affidavit of Service.
3. In compliance with Wis. Stat. §§ 227.48, 551.611, and 891.46; and Wis. Admin. Code. §§ DFI-Sec 8.06 and 8.07, I have also caused to be served copies of those same documents upon the Administrator for the Division of Securities.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

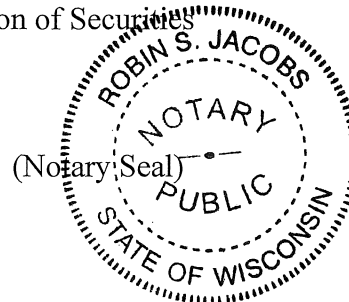
Valerie Schmidt
VALERIE SCHMIDT

State of Wisconsin
Department of Financial Institutions
Division of Securities

Subscribed and sworn to before me
This 23rd day of December, 2025.

Robin Jacobs

Notary Public, State of Wisconsin
My commission is permanent.





State of Wisconsin
Department of Financial Institutions

Tony Evers, Governor

Wendy K. Baumann, Secretary-designee

AFFIDAVIT OF SERVICE
AND COMPLIANCE WITH WIS. STAT. § 551.611

STATE OF WISCONSIN )
) ss.
COUNTY OF DANE )

I, VALERIE SCHMIDT, first being duly sworn, depose and state:

- 1. I am employed with the State of Wisconsin, Department of Financial Institutions, Division of Securities.
2. On the date of this Affidavit and in the course of regularly conducted activity, I have caused to be served via WhatsApp upon Mitchell Maddison at (513) 582-1635:
i. A copy of the Summary Order to Cease and Desist and Revoking Exemptions and Notice of Proposed Order for Restitution and Penalties; DFI Case No. S-251344 (EX); and
ii. A copy of this Affidavit of Service.
3. In compliance with Wis. Stat. §§ 227.48, 551.611, and 891.46; and Wis. Admin. Code. §§ DFI-Sec 8.06 and 8.07, I have also caused to be served copies of those same documents upon the Administrator for the Division of Securities.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Valerie Schmidt
VALERIE SCHMIDT

State of Wisconsin
Department of Financial Institutions
Division of Securities

Subscribed and sworn to before me
This 23rd day of December 2025.

Robin Jacobs

Notary Public, State of Wisconsin
My commission is permanent.

